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February 8, 2024

BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*, No. 23 Civ. 1529 (VEC)

Your Honor:

I am Of Counsel to Beldock Levine & Hoffman LLP, representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). On behalf of Plaintiffs, I write to respectfully request a 14-day extension of the February 20, 2024 deadline for Plaintiffs' response to Defendant's motion for summary judgment. Under the revised briefing schedule, Plaintiffs' opposition brief would be due March 5, 2024 and Defendant's reply, if any, would be due on March 26, 2024. Defendant consents to this request.

This is the first request by Plaintiffs for an extension of the briefing schedule. I was very recently brought into the case after the departures of the two associates previously handling this matter at the end of December, and respectfully request a short extension to adequately digest the file, consult with the Plaintiffs and prepare an appropriate response to Defendant's motion papers.

We thank the Court for its attention to this matter.

BELDOCK LEVINE & HOFFMAN LLP

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February 8, 2024

Page 2

Respectfully submitted,


Benjamin Meyers

cc: Defendant's counsel (by ECF)